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March 16, 2006

VIA ELECTRONIC AND HAND DELIVERY

The Honorable Charles L.A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Drive, Suite 100
Columbia, SC

RE: Annual Review of Base Rates for Fuel Costs of South Carolina Electric & Gas
Company
Docket No. 2006-2-E

SC PUBLIC SERVICE
COMMISSION
2006 MAR 16 PM 2:57
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Dear Mr. Terreni:

We are filing herewith the original and twenty-five (25) true and correct copies of the **Testimony of Dennis W. Goins** for filing on behalf of CMC Steel South Carolina ("CMC") (formerly known as SMI Steel-South Carolina) in the above-referenced docket. Because the prefiled testimony of Dennis W. Goins contains confidential information obtained from SCE&G pursuant to a Confidentiality Agreement by and between CMC and SCE&G, CMC is requesting that the Testimony of Dennis W. Goins be received in its original form under seal for Commission review. Also, as reflected in our letter to you of March 14, 2006, we are requesting that the Commission accept the filing of this testimony one day beyond the March 15, 2006 deadline established by the Commission. We have requested and obtained the consent of all parties in this matter (SCE&G, ORS & SCEUC) to the one day extension for submission of CMC's prefiled testimony.

In accordance with Order No. 2005-226 of Docket No. 2005-83-A, CMC is providing the true and correct copies of the Testimony of Dennis W. Goins to the Commission in a sealed envelope marked "CONFIDENTIAL." The testimony itself is also marked "CONFIDENTIAL." Also pursuant to Order No. 2005-226, enclosed herewith for filing are twenty-five (25) redacted copies of the Testimony of Dennis W. Goins.

By copy of this letter, I am serving all parties of record with the redacted copy of the Testimony of Dennis W. Goins. CMC is also serving SCE&G with a true and correct unredacted copy of the Testimony of Dennis W. Goins. I am enclosing my certificate of service to that effect.

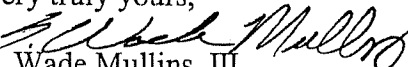
The Honorable Charles L.A. Terreni
March 16, 2006
Page 2 of 2

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it via the person delivering same.

If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,


E. Wade Mullins, III

cc: Damon E. Xenopoulos, Esquire
Counsel of record

Enclosures

**BEFORE THE
SOUTH CAROLINA
PUBLIC SERVICE COMMISSION**

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COMMISSION

In the Matter of:)

Annual Review of Base Rates for Fuel Costs of)
South Carolina Electric & Gas Company)

Docket No. 2006-2-

_____)
This is to certify that I have caused to be served this day, one (1) redacted copy of the
Testimony of Dennis W. Goins, by hand-delivery and electronic mail service as follows unless
otherwise noted:

**Mitchell M. Willoughby, Esquire
Willoughby & Hoefer, P.A.
P. O. Box 8416
Columbia, SC 29202**

**Patricia B. Morrison, Esquire
South Carolina Electric & Gas Company
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Office of Regulatory Staff
1441 Main Street, Suite 300
Columbia, SC 29201**

Columbia, South Carolina
March 16, 2006



Debbie Wiles

**STATE OF SOUTH CAROLINA
BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

DOCKET NO. 2006-2-E

**SOUTH CAROLINA ELECTRIC & GAS COMPANY
ANNUAL REVIEW OF BASE RATES FOR FUEL COSTS**

**REDACTED DIRECT TESTIMONY OF
DR. DENNIS W. GOINS
ON BEHALF OF
CMC STEEL SOUTH CAROLINA**

March 2006

SC PUBLIC SERVICE
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**STATE OF SOUTH CAROLINA
BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

IN RE: SOUTH CAROLINA ELECTRIC & GAS)	
COMPANY ANNUAL REVIEW OF BASE)	Docket No. 2006-2-E
RATES FOR FUEL COSTS)	

**REDACTED DIRECT TESTIMONY OF
DR. DENNIS W. GOINS
ON BEHALF OF
CMC STEEL SOUTH CAROLINA**

INTRODUCTION AND QUALIFICATIONS

1
2 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS**
3 **ADDRESS.**

4 **A.** My name is Dennis W. Goins. I operate Potomac Management Group, an
5 economics and management consulting firm. My business address is 5801
6 Westchester Street, Alexandria, Virginia 22310.

7 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND**
8 **PROFESSIONAL BACKGROUND.**

9 **A.** I received a Ph.D. degree in economics and a Master of Economics degree
10 from North Carolina State University. I also earned a B.A. degree with
11 honors in economics from Wake Forest University. From 1974 through
12 1977 I worked as a staff economist at the North Carolina Utilities
13 Commission. During my tenure at the Commission, I testified in
14 numerous cases involving electric, gas, and telephone utilities on such
15 issues as cost of service, rate design, intercorporate transactions, and load

1 forecasting. While at the Commission, I also served as a member of the
2 Ratemaking Task Force in the national Electric Utility Rate Design Study
3 sponsored by the Electric Power Research Institute (EPRI) and the
4 National Association of Regulatory Utility Commissioners (NARUC).

5 Since 1978 I have worked as an economic and management consultant
6 to firms and organizations in the private and public sectors. My
7 assignments focus primarily on market structure, planning, pricing, and
8 policy issues involving firms that operate in energy markets. For example,
9 I have conducted detailed analyses of product pricing, cost of service, rate
10 design, and interutility planning, operations, and pricing; prepared
11 analyses related to utility mergers, transmission access and pricing, and the
12 emergence of competitive markets; evaluated and developed regulatory
13 incentive mechanisms applicable to utility operations; and assisted clients
14 in analyzing and negotiating interchange agreements and power and fuel
15 supply contracts. I have also assisted clients on electric power market
16 restructuring issues in Arkansas, New Jersey, New York, South Carolina,
17 Texas, and Virginia.

18 I have submitted testimony and affidavits and provided technical
19 assistance in more than 100 proceedings before state and federal agencies
20 as an expert in cost of service, rate design, utility planning and operating
21 practices, regulatory policy, and competitive market issues. These
22 agencies include the Federal Energy Regulatory Commission (FERC), the
23 General Accounting Office, the Circuit Court of Kanawha County, West
24 Virginia, the First Judicial District Court of Montana, and regulatory
25 agencies in Alabama, Arkansas, Arizona, Colorado, Florida, Georgia,
26 Idaho, Illinois, Kentucky, Louisiana, Maine, Massachusetts, Minnesota,
27 Mississippi, New Jersey, New York, North Carolina, Ohio, Oklahoma,
28 South Carolina, Texas, Utah, Vermont, Virginia, and the District of
29 Columbia. A listing of these regulatory and court proceedings is presented
30 in Appendix A.

1 **Q. ON WHOSE BEHALF ARE YOU APPEARING IN THIS**
2 **PROCEEDING?**

3 **A.** I am appearing on behalf of CMC Steel South Carolina,¹ a member of the
4 CMC Steel Group.

5 **Q. WHAT ASSIGNMENT WERE YOU GIVEN WHEN YOU WERE**
6 **RETAINED?**

7 **A.** I was asked to undertake two primary tasks:
8 1. Review the 2006 base fuel rate filing made by South Carolina
9 Electric & Gas Company (SCE&G).
10 2. Identify any major deficiencies in SCE&G's proposed base fuel
11 rate, and suggest recommended changes.

12 **Q. WHAT SPECIFIC INFORMATION DID YOU REVIEW IN**
13 **CONDUCTING YOUR EVALUATION?**

14 **A.** I reviewed SCE&G's filing, testimony, exhibits, and responses to requests
15 for information. I also reviewed information found on web sites operated
16 by the Commission and by SCE&G and its parent—SCANA Corporation.
17 In addition, I reviewed the Office of Regulatory Staff (ORS) report
18 recently filed with the Commission concerning SCE&G's fuel-related
19 expenses, policies, practices, and operations.²

20 **CONCLUSIONS**

21 **Q. WHAT CONCLUSIONS HAVE YOU REACHED?**

22 **A.** On the basis of my review and evaluation, I have concluded the following:
23 1. SCE&G has proposed increasing the current base fuel rate by 3.45
24 mills per kWh (15.3 percent)—from 22.56 mills per kWh to 26.01

¹ Prior to March 1, 2006, CMC Steel South Carolina was known as SMI Steel-South Carolina.

² *Study of South Carolina Electric and Gas Company Fuel Expenses*, Office of Regulatory Staff, Electric and Natural Gas Department, Docket No. 2005-2-E, December 31, 2005. In the

1 mills per kWh. This proposed increase follows the 4.92 mills per
2 kWh (27.9 percent) base fuel rate increase that SCE&G received in
3 its 2005 fuel case (Docket No. 2005-2-E). If the Commission
4 approves SCE&G's proposed base fuel rate, the fuel component of
5 SCE&G's base rates will have increased by 8.37 mills per kWh
6 (nearly 47.5 percent) in 2 years.

- 7 2. SCE&G's estimated accumulated deferred fuel cost balance at the
8 end of April 2006 is approximately \$38.4 million. As a result,
9 SCE&G designed its proposed 26.01 mills per kWh base fuel rate
10 to recover not only its expected fuel costs for May 2006 through
11 April 2007, but also the \$38.4 million unrecovered balance.
- 12 3. The increase in SCE&G's fuel costs has been driven primarily by
13 recent dramatic increases in coal, natural gas, and No. 2 fuel oil
14 prices.

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20 RECOMMENDATIONS

21 **Q. WHAT DO YOU RECOMMEND ON THE BASIS OF THESE**
22 **CONCLUSIONS?**

23 **A.** I recommend that the Commission:

- 24 1. Reject SCE&G's proposed 26.01 mills per kWh base fuel rate.
25 Instead, the Commission should set the rate to spread collection of
26 SCE&G's estimated \$38.4 million deferred fuel cost balance
27 (through April 2006) over two years. This option is identical to the

remainder of my testimony, I refer to this document as the ORS Report.

1 cost-recovery method the Commission approved in Docket No.
2 2005-2-E. Under this option, SCE&G's base fuel rate for May
3 2006 – April 2007 would be 25.15 mills per kWh—or 0.86 mills
4 per kWh less than SCE&G's proposed 26.01 mills per kWh.
5 Although this option is premised on a 2-year deferred recovery
6 period, its operation would provide SCE&G an opportunity to
7 recover its deferred fuel cost balance during the 12 months in
8 which a new base fuel rate is in effect. More specifically, to meet
9 this objective, I recommend that the first revenue collected under
10 the new base fuel rate beginning May 2006 be applied to SCE&G's
11 deferred fuel cost balance. In my opinion, this 2-year recovery
12 option strikes a reasonable balance between South Carolina
13 ratepayers and SCE&G's shareholders.

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SCE&G'S PROPOSAL

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18 **Q. WHAT IS SCE&G'S CURRENT BASE FUEL RATE?**

19 **A.** The current rate (effective May 2005 – April 2006) is 22.56 mills per
20 kWh. This rate resulted from a settlement in SCE&G's last base fuel rate
21 case (Docket No. 2005-2-E). As part of that settlement, the base fuel rate
22 included an adjustment to recover SCE&G's estimated \$37.9 million
23 unrecovered fuel cost balance through April 2005 over 2 years. The 2-year
24 deferred recovery was designed to mitigate adverse rate impacts caused by
25 significant increases in SCE&G's fuel costs.

1 **Q. WHAT BASE FUEL RATE HAS SCE&G PROPOSED IN THIS**
2 **CASE?**

3 **A.** SCE&G has proposed a 26.01 mills per kWh base fuel rate, which reflects
4 a 3.45 mills per kWh (15.3 percent) increase in the current 22.56 mills per
5 kWh base fuel rate. This proposed increase follows the 4.92 mills per
6 kWh (27.9 percent) increase that SCE&G received in its 2005 fuel case.

7 **Q. DOES SCE&G'S PROPOSAL CONTINUE THE RECENT**
8 **UPWARD TREND IN ITS BASE FUEL RATE?**

9 **A.** Yes. If the Commission approves SCE&G's proposed base fuel rate, the
10 fuel component of SCE&G's base rates will have increased by 8.37 mills
11 per kWh (nearly 47.5 percent) in 2 years.

12 **Q. WHAT EFFECT WILL SCE&G'S PROPOSED BASE FUEL RATE**
13 **HAVE ON CUSTOMERS' BILLS?**

14 **A.** The proposed base fuel rate will increase the base fuel component of
15 customers' bills by more than 15 percent. As shown in Exhibit DWG-1,
16 annual electricity cost increases for typical residential and commercial
17 customers range from 3.56 percent to 4.32 percent, while large, higher
18 load factor industrial customers could see annual increases exceeding 7
19 percent. In other words, SCE&G's proposed base fuel rate will have a
20 significant effect on electricity bills, especially bills paid by larger, higher
21 load factor customers.

22 **Q. WHAT ARE THE PRINCIPAL DRIVERS BEHIND THIS LARGE**
23 **INCREASE IN SCE&G'S BASE FUEL RATE?**

24 **A.**

25

⁶ See direct testimony of SCE&G witnesses Gerhard Haimberger and Rose Jackson and
. As Mr. Haimberger notes (direct testimony at 5), coal prices have stabilized at

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6 **Q. DOES THE PROPOSED RATE INCLUDE AN ADJUSTMENT TO**
7 **RECOVER SCE&G'S DEFERRED FUEL COST BALANCE?**

8 **A.** Yes. SCE&G estimates that its accumulated deferred fuel cost balance at
9 the end of April 2006 will be approximately \$38.4 million—almost the
10 same as its estimated \$37.9 million under-recovery through April 2005.
11 SCE&G designed its proposed 26.01 mills per kWh base fuel rate to
12 recover not only its expected fuel costs for May 2006 through April 2007,
13 but also the \$38.4 million unrecovered balance.

14 **Q. IF SCE&G'S BASE FUEL RATE IS NOT CHANGED, WILL ITS**
15 **DEFERRED FUEL COST BALANCE INCREASE?**

16 **A.** Yes. Using SCE&G's fuel cost and sales forecasts, I estimate that its
17 deferred fuel cost balance will grow to more than \$77 million by April
18 2007 if the current base fuel rate is not increased. (See Exhibit DWG-2.)

19 **Q. SHOULD THE COMMISSION APPROVE SCE&G'S PROPOSED**
20 **BASE FUEL RATE?**

21 **A.** No. I recommend that the Commission reject SCE&G's proposed 26.01
22 mills per kWh base fuel rate. Instead, the Commission should approve the
23 alternative rate proposal that I describe later. The recent dramatic
24 escalation in fuel costs is not unique to SCE&G. During this period of
25 increasing costs, the Commission should attempt to balance the adverse
26 rate impacts on consumers with SCE&G's right to recover its reasonable

escalated levels they reached in 2005.

1 and prudent fuel costs in a timely manner. In my opinion, my alternative
2 proposal does a better job of matching these competing objectives.

3 **ALTERNATIVE PROPOSAL**

4 **Q. HAVE YOU DEVELOPED AN ALTERNATIVE BASE FUEL RATE**
5 **PROPOSAL?**

6 **A.** Yes. I recommend setting the rate to spread collection of SCE&G's
7 estimated \$38.4 million deferred fuel cost balance (through April 2006)
8 over two years. Under this option, SCE&G's base fuel rate for May 2006
9 – April 2007 would be 25.15 mills per kWh—or 0.86 mills per kWh less
10 than SCE&G's proposed 26.01 mills per kWh. (See Exhibit DWG-3.)

11 **Q. DOES THIS OPTION PROVIDE SCE&G A REASONABLE**
12 **OPPORTUNITY TO RECOVER ITS DEFERRED FUEL COSTS?**

13 **A.** Yes. Although this option is premised on a 2-year deferred recovery
14 period, its operation would provide SCE&G an opportunity to recover its
15 deferred fuel cost balance determined in this case during the 12 months in
16 which a new base fuel rate is in effect. More specifically, to meet this
17 objective, I recommend that the first revenue collected under the new base
18 fuel rate beginning May 2006 be applied to SCE&G's deferred fuel cost
19 balance. In my opinion, this 2-year recovery option strikes a reasonable
20 balance between South Carolina ratepayers and SCE&G's shareholders.

21 **Q. HAS THE COMMISSION APPROVED A SIMILAR PROPOSAL**
22 **BEFORE?**

23 **A.** Yes. In SCE&G's last base fuel rate case (Docket No. 2005-2-E), the
24 Commission approved an identical cost-recovery method.

1 **Q. UNDER YOUR RECOMMENDED ALTERNATIVE, WHAT IS**
2 **SCE&G'S ESTIMATED DEFERRED FUEL COST BALANCE**
3 **THROUGH APRIL 2007?**

4 **A. The estimated under-recovery through April 2007 is approximately \$19.5**
5 **million. (See Exhibit DWG-4.)**

6 **Q. IS YOUR RECOMMENDED ALTERNATIVE IN THE PUBLIC**
7 **INTEREST?**

8 **A. Yes. My recommended base fuel rate would:**
9 ■ Mitigate the adverse rate impacts caused by SCE&G's proposal
10 while giving SCE&G a reasonable opportunity to recover its fuel
11 costs.
12 ■ Increase SCE&G's incentive through regulatory lag to minimize
13 fuel costs.

14 **RELATED FUEL COST ISSUES**

15 **Q. DID YOU IDENTIFY SPECIFIC FUEL-RELATED ISSUES THAT**
16 **DESERVE FURTHER SCRUTINY AND EVALUATION?**

17 **A. Yes.**

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23 **Q.**

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25 **A. Yes.**

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8 **Q.**

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9 **A.** Yes.

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12 **Q.**

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⁹ See SCE&G's response to

¹⁰ See SCE&G's response to

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19 Q. DOES THIS COMPLETE YOUR DIRECT TESTIMONY?

20 A. Yes.

**STATE OF SOUTH CAROLINA
BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

DOCKET NO. 2006-2-E

**SOUTH CAROLINA ELECTRIC & GAS COMPANY
ANNUAL REVIEW OF BASE RATES FOR FUEL COSTS**

**EXHIBITS TO THE
REDACTED DIRECT TESTIMONY OF
DR. DENNIS W. GOINS
ON BEHALF OF
CMC STEEL SOUTH CAROLINA**

March 2006

EXHIBIT DWG-1
PAGE 1 OF 5

SCE&G'S RESPONSE TO SCEUC 1-6

**SOUTH CAROLINA ELECTRIC & GAS COMPANY
SCEUC INTERROGATORIES – SET NO. 1
DOCKET NO. 2006-2-E**

QUESTION NO. 1-6

Please provide a breakdown of any cost increase, both in dollar and percentage terms, for the typical residential, commercial and industrial consumer.

ANSWER NO. 1-6

See attached.

Effect of Fuel Factor Change on Residential Customers
(For Rate 8 @ 1,000 kWh per Month)

Current Fuel Factor	Proposed Fuel Factor	Impact of Rev. Tax
\$0.02256	\$0.02601	0.00002
Current Annual Bill	Proposed Annual Bill	Percentage Increase
\$1,168.09	\$1,209.73	3.56%
Current Average per kWh	Proposed Average per kWh	
\$0.09734	\$0.10081	

Effect of Fuel Factor Change on Commercial Customers

(For Rate 20 @ 150,000 kWh per Month)

(For Rate 20 @ 500 kva per Month)

Current Fuel Factor	Proposed Fuel Factor	Impact of Rev. Tax
\$0.02256	\$0.02601	0.00002
Current Annual Bill	Proposed Annual Bill	Percentage Increase
\$144,588.00	\$150,834.00	4.32%
Current Average per kWh	Proposed Average per kWh	
\$0.08033	\$0.08380	

Effect of Fuel Factor Change on Industrial Customers
(For Rate 23 @ 10,000 kW Demand and 90% Load Factor per Month)

Current Fuel Factor	Proposed Fuel Factor	Impact of Rev. Tax
\$0.02256	\$0.02601	\$0.00002
Current Annual Bill	Proposed Annual Bill	Percentage Increase
\$3,830,179.20	\$4,103,754.00	7.14%
Current Average per kWh	Proposed Average per kWh	
\$0.04858	\$0.05205	

Recommended SCE&G Base Fuel Rate: May 2006 - April 2007		
1.	Total Fuel Costs May 2006 - April 2007	\$ 603,275,000
2.	Total System - Intersystem GWh May 2006 - April 2007	23,985
3.	Fuel Cost (\$/kWh)	0.02515
4.	Fixed Capacity Charges (\$/kWh)	0.00000
5.	Net Fuel Cost (\$/kWh)	0.02515
6.	Under(Over)-Recovery through April 2006	\$ 38,394
7.	Retail GWh May 2006 - April 2005	22,470
8.	2-Year Deferral Rate: Prior Under-Recovery (\$/kWh)	0.00000
9.	Recommended Base Fuel Rate 2-Yr Deferral (\$/kWh) [5+8]	<u>0.02515</u>

[illegible]

APPENDIX A

QUALIFICATIONS OF

DENNIS W. GOINS

DENNIS W. GOINS

PRESENT POSITION

Economic Consultant, Potomac Management Group, Alexandria, Virginia.

AREAS OF QUALIFICATION

- Competitive Market Analysis
- Costing and Pricing Energy-Related Goods and Services
- Utility Planning and Operations
- Litigation Analysis, Strategy Development, Expert Testimony

PREVIOUS POSITIONS

- Vice President, Hagler, Bailly & Company, Washington, DC.
- Principal, Resource Consulting Group, Inc., Cambridge, Massachusetts.
- Senior Associate, Resource Planning Associates, Inc., Cambridge, Massachusetts.
- Economist, North Carolina Utilities Commission, Raleigh, North Carolina.

EDUCATION

College	Major	Degree
Wake Forest University	Economics	BA
North Carolina State University	Economics	ME
North Carolina State University	Economics	PhD

RELEVANT EXPERIENCE

Dr. Goins specializes in pricing, planning, and market structure issues affecting firms that buy and sell products in electricity and natural gas markets. He has extensive experience in evaluating competitive market conditions, analyzing power and fuel requirements, prices, market operations, and transactions, developing product pricing strategies, setting rates for energy-related products and services, and negotiating power supply and natural gas contracts for private and public entities. He has participated in more than 100 cases as an expert on competitive market issues, utility restructuring, power market planning and operations, utility mergers, rate design, cost of service, and management prudence

before the Federal Energy Regulatory Commission, the General Accounting Office, the First Judicial District Court of Montana, the Circuit Court of Kanawha County, West Virginia, and regulatory commissions in Alabama, Arizona, Arkansas, Colorado, Florida, Georgia, Idaho, Illinois, Kentucky, Louisiana, Maine, Massachusetts, Minnesota, Mississippi, New Jersey, New York, North Carolina, Ohio, Oklahoma, South Carolina, Texas, Utah, Vermont, Virginia, and the District of Columbia. He has also prepared an expert report on behalf of the United States regarding pricing and contract issues in a case before the United States Court of Federal Claims.

PARTICIPATION IN REGULATORY, ADMINISTRATIVE, AND COURT PROCEEDINGS

1. Entergy Gulf States Inc., before the Public Utilities Commission of Texas, PUC Docket No. 31544/ SOAH Docket No. 473-06-0092 (2006), on behalf of Texas Cities, re transition to competition rider.
2. Idaho Power Company, before the Idaho Public Utilities Commission, Case No. IPC-E-05-28 (2006), on behalf of the U.S. Department of Energy (Federal Executive Agencies), re cost-of-service and rate design issues.
3. Alabama Power Company, before the Alabama Public Service Commission, Docket No. 18148 (2005), on behalf of SMI Steel-Alabama, re energy cost recovery.
4. Florida Power & Light Company, before the Florida Public Service Commission, Docket No. 050001-EI (2005), on behalf of the U.S. Air Force (Federal Executive Agencies), re fuel and capacity cost recovery.
5. Entergy Gulf States Inc., before the Public Utilities Commission of Texas, PUC Docket No. 31315/ SOAH Docket No. 473-05-8446 (2005), on behalf of Texas Cities, re incremental purchased capacity cost rider.
6. Florida Power & Light Company, before the Florida Public Service Commission, Docket No. 050045-EI (2005), on behalf of the U.S. Air Force (Federal Executive Agencies), re cost-of-service and interruptible rate issues.
7. Arkansas Electric Cooperative Corporation, before the Arkansas Public Service Commission, Docket No. 05-042-U (2005), on behalf of Nucor Steel and Nucor-Yamato Steel, re power plant purchase.
8. Arkansas Electric Cooperative Corporation, before the Arkansas Public Service Commission, Docket No. 04-141-U (2005), on behalf of Nucor Steel and Nucor-Yamato Steel, re cost-of-service and interruptible rate issues.
9. Dominion North Carolina Power, before the North Carolina Utilities Commission, Docket No. E-22, Sub 412 (2005), on behalf of Nucor Steel-Hertford, re cost-of-service and interruptible rate issues.

10. Public Service Company of Colorado, before the Colorado Public Utilities Commission, Docket No. 04S-164E (2004), on behalf of the U.S. Air Force (Federal Executive Agencies), re cost-of-service and interruptible rate issues.
11. CenterPoint Energy Houston Electric, LLC, *et al.*, before the Public Utility Commission of Texas, PUC Docket No. 29526 (2004), on behalf of the Coalition of Commercial Ratepayers, re stranded cost true-up balances.
12. PacifiCorp, before the Utah Public Service Commission, Docket No. 04-035-11 (2004), on behalf of the U.S. Air Force (United States Executive Agencies), re time-of-day rate design issues.
13. Arizona Public Service Company, before the Arizona Corporation Commission, Docket No. E-01345A-03-0347 (2004), on behalf of the U.S. Air Force (Federal Executive Agencies), re retail cost allocation and rate design issues.
14. Idaho Power Company, before the Idaho Public Utilities Commission, Case No. IPC-E-03-13 (2004), on behalf of the U.S. Department of Energy (Federal Executive Agencies), re retail cost allocation and rate design issues.
15. PacifiCorp, before the Utah Public Service Commission, Docket No. 03-2035-02 (2004), on behalf of the U.S. Air Force (United States Executive Agencies), re retail cost allocation and rate design issues.
16. Dominion Virginia Power, before the Virginia State Corporation Commission, Case No. PUE-2000-00285 (2003), on behalf of Chaparral (Virginia) Inc., re recovery of fuel costs.
17. Jersey Central Power & Light Company, before the New Jersey Board of Public Utilities, BPU Docket No. ER02080506, OAL Docket No. PUC-7894-02 (2002-2003), on behalf of New Jersey Commercial Users, re retail cost allocation and rate design issues.
18. Public Service Electric and Gas Company, before the New Jersey Board of Public Utilities, BPU Docket No. ER02050303, OAL Docket No. PUC-5744-02 (2002-2003), on behalf of New Jersey Commercial Users, re retail cost allocation and rate design issues.
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